

Presented to the Court by the foreman of the  
Grand Jury in open Court, in the presence of  
the Grand Jury and FILED in the U.S.  
DISTRICT COURT at Seattle, Washington.

October 4<sup>th</sup> 2023  
Ravi Subramanian, Clerk  
By [Signature] Deputy

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,  
Plaintiff,

v.

JOSEPH DANIEL SCHMIDT,  
Defendant.

NO. **CR 23 - 158 JCC**  
**INDICTMENT**

The Grand Jury charges that:

**COUNT 1**

***(Attempt to Deliver National Defense Information)***

Beginning in or about February 2020, and continuing through in or about  
July 2020, in locations outside the jurisdiction of any particular state or district, within  
the extraterritorial jurisdiction of the United States and therefore within the venue of the  
United States District Court for the Western District of Washington pursuant to Title 18,  
United States Code, Section 3238, as the last known residence of the offender, JOSEPH  
DANIEL SCHMIDT, having unauthorized possession of, access to, and control over  
information relating to the national defense, which JOSEPH DANIEL SCHMIDT had  
reason to believe could be used to the injury of the United States and to the advantage of

1 any foreign nation, did willfully attempt to communicate, deliver, and transmit, and  
2 attempt to cause to be communicated, delivered, and transmitted, said information to a  
3 person not entitled to receive it.

4 All in violation of Title 18, United States Code, Section 793(e).

5 //

6 //

7 //

8 //

9 //

10 //

11 //

12 //

13 //

14 //

15 //

16 //

17 //

18 //

19 //

20 //

21 //

22 //

23 //

24 //

25 //

26 //

27 //

COUNT 2*(Retention of National Defense Information)*

Beginning in or about February 2020, and continuing through in or about July 2020, in locations outside the jurisdiction of any particular state or district, within the extraterritorial jurisdiction of the United States and therefore within the venue of the United States District Court for the Western District of Washington pursuant to Title 18, United States Code, Section 3238, as the last known residence of the offender, JOSEPH DANIEL SCHMIDT, having unauthorized possession of, access to, and control over information relating to the national defense, which JOSEPH DANIEL SCHMIDT had reason to believe could be used to the injury of the United States and to the advantage of any foreign nation, did willfully retain said information and fail to deliver it to the officer or employee of the United States entitled to receive it.

All in violation of Title 18, United States Code, Section 793(e).

A TRUE BILL: *yes*

DATED: *October 4, 2023*

*Signature of Foreperson redacted pursuant to the policy of the Judicial Conference of the United States.*

\_\_\_\_\_  
FOREPERSON

*[Signature]*  
\_\_\_\_\_  
TESSA M. GORMAN  
Acting United States Attorney

*[Signature]*  
\_\_\_\_\_  
TODD GREENBERG  
Assistant United States Attorney